

Caroline Constant Final Designations

Designation List Report



Constant, Caroline

2022-10-13

Plaintiff Direct	00:21:09
TOTAL RUN TIME	00:21:09



CC_FINAL - Caroline Constant Final Designations

DESIGNATION	SOURCE	DURATION	ID
7:16 - 8:19	Constant, Caroline 2022-10-13	00:01:04	CC_FINAL.1
7:16	Q. Professor Constant, as you know, we're		
7:17	taking your video deposition today to present to the		
7:18	jury in Philadelphia in Cathrine Veikos's civil		
7:19	rights trial, which is scheduled for January.		
7:20	My understanding is that you		
7:21	live in Boston; is that correct?		
7:22	A. That's correct.		
7:23	Q. Is that where you are right now?		
7:24	A. Yes.		
8:01	Q. Well, thank you for making yourself		
8:02	available to testify today.		
8:03	I want to start with an		
8:04	invitation. My understanding is you received an		
8:05	invitation to serve as an external reviewer in		
8:06	Cathrine Veikos's tenure case in the 2010 and 2011		
8:07	academic cycle; is that correct?		
8:08	A. That's correct.		
8:09	Q. Okay.		
8:10	A. The letter was dated 2011.		
8:11	Q. Okay. And let's take a look at that.		
8:12	You should have with you a		
8:13	document that was pre-marked as Exhibit P-26, if you		
8:14	could take a look at that.		
8:15	A. Yes.		
8:16	Q. Okay. Is that the letter inviting you		
8:17	to be an external reviewer in Professor Veikos's		
8:18	case?		
8:19	A. It is.		
8:23 - 10:17	Constant, Caroline 2022-10-13	00:02:02	CC_FINAL.2
8:23	BY MS. UEHLER:		
8:24	Q. All right. This -- let's look at that		
9:01	letter from January 21st, 2011. It looks like it		
9:02	was from Professor Braham.		
9:03	Did you know Professor Braham		
9:04	prior to receiving this letter from him?		
9:05	A. I don't believe I knew -- have ever known		
9:06	him personally, but I have heard of his reputation		
9:07	as a scholar.		
9:08	Q. What position did you hold at the time		

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DESIGNATION	SOURCE	DURATION	ID
	9:09 this letter was sent?		
	9:10 A. I was a Professor of Architecture in the		
	9:11 Taubman College of Architecture and Urban Planning		
	9:12 at the University of Michigan.		
	9:13 Q. Okay. And so did you agree to write		
	9:14 an external review letter for Professor Veikos?		
	9:15 A. I did.		
	9:16 Q. All right. So looking back at		
	9:17 Exhibit P-26, this letter, which was dated		
	9:18 January 21st, appears to have a deadline of		
	9:19 February 23rd of 2011.		
	9:20 Did you feel you had sufficient		
	9:21 time to prepare an assessment of Professor Veikos's		
	9:22 scholarship in that time?		
	9:23 A. I recall that I was particularly busy during		
	9:24 that period, so I actually worked very quickly to		
	10:01 send my evaluation early because of my impending		
	10:02 teaching requirements and other requirements.		
	10:03 Q. Okay. At that time, so the 2010-2011		
	10:04 academic year, had you had prior experience as an		
	10:05 external reviewer in other tenure cases?		
	10:06 A. Yes, I had. I don't recall the exact		
	10:07 number, but several tenure cases, and also a couple		
	10:08 of cases of promotion to full professor --		
	10:09 Q. Okay. Thank you.		
	10:10 A. -- who were already tenured.		
	10:11 BY MS. UEHLER:		
	10:12 Q. Let's take a look now, if you could,		
	10:13 to the exhibit that was marked as P-27.		
	10:14 First, it's a letter dated		
	10:15 February 9th, 2011. Is this your letter that you		
	10:16 sent to Professor Braham?		
	10:17 A. It is.		
10:20 - 14:08	Constant, Caroline 2022-10-13	00:03:51	CC_FINAL.3
	10:20 BY MS. UEHLER:		
	10:21 Q. All right. Let's look at this letter		
	10:22 together. The first paragraph makes reference to		
	10:23 already knowing Cathrine Veikos. Could you just		
	10:24 describe for the jury how you knew Professor Veikos		
	11:01 at that time?		

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DESIGNATION	SOURCE	DURATION	ID
11:02	A. She was a student at Harvard Graduate School		
11:03	of Design at the time I was teaching there. I		
11:04	actually still don't recall whether she was ever in		
11:05	one of my classes, but I did know her.		
11:06	Q. Okay. Now, if you could take a look		
11:07	at the second paragraph of that same letter, which		
11:08	is P-27. Would you read out loud for the jury what		
11:09	you wrote there about Professor Veikos?		
11:10	A. "It is evident from Veikos's record of		
11:11	scholarly contributions that she has been		
11:12	particularly productive since she began her		
11:13	tenure-track position at the University of		
11:14	Pennsylvania in 2003. In that period --" do you		
11:15	want me to read the whole thing?		
11:16	Q. That's okay. I just wanted to get		
11:17	your overview as you had described it in your		
11:18	letter.		
11:19	A. Okay.		
11:20	Q. And I think, there's another section,		
11:21	I think, that I wanted to draw your attention to		
11:22	about your opinion at the time.		
11:23	If you look at the third		
11:24	paragraph, the one that begins, "Although Veikos."		
12:01	About four lines down, it starts "Veikos began."		
12:02	There's a discussion of Professor Veikos's recent		
12:03	scholarship on the work of Bo Bardi. Could you read		
12:04	that?		
12:05	A. "Veikos began this research in 2005 and set		
12:06	her book proposal or manuscript --" in quote -- in		
12:07	parentheses -- "to Routledge for review in December,		
12:08	2010. Unfortunately, she did not include any		
12:09	portion of the manuscript in her dossier, which		
12:10	would have aided in more fully evaluating her		
12:11	contribution to existing Bo Bardi scholarship."		
12:12	Q. All right. Let me stop you there.		
12:13	So is it typical when you're		
12:14	doing an external review to have the full		
12:15	manuscripts for the publications in the dossier?		
12:16	A. In my experience, absolutely, yes.		
12:17	Q. Okay. Did the lack of the manuscript		
12:18	at this time make you wonder whether it was even		

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DESIGNATION	SOURCE	DURATION	ID
12:19	completed?		
12:20	A. Yes. Of course.		
12:21	Q. Okay. All right. Let's take a look		
12:22	at the second page of this February 9th letter,		
12:23	which is P-27.		
12:24	I'm looking at the paragraph		
13:01	that begins, "It is unclear."		
13:02	And I know this is a little bit		
13:03	awkward for all of us, but because of the way your		
13:04	testimony is being presented, could you read out		
13:05	loud what you had written in that paragraph for the		
13:06	jury?		
13:07	A. Yes. "It is unclear why Veikos presents two		
13:08	separate book proposals: One focusing on the		
13:09	writings of Bo Bardi and their theoretical		
13:10	foundations, and the other on the built work and its		
13:11	representation. It would seem that a single		
13:12	publication would more convincingly engage the		
13:13	conceptual integration of theory and practice that		
13:14	Veikos identifies as germane to Bo Bardi's work.		
13:15	The time required to realize this more ambitious		
13:16	undertaking was undoubtedly a factor in Veikos's		
13:17	desire to produce a shorter book prior to coming up		
13:18	for tenure. Yet it is not clear from her dossier		
13:19	how close she is to completing that project. The		
13:20	amount of research required for either undertaking		
13:21	is prodigious. I only wish that the dossier		
13:22	manifested a clear indication of her ability to		
13:23	achieve her commendable goals for either of these		
13:24	publications, particularly for the first one for		
14:01	which she indicates an expected publication date of		
14:02	October, 2011."		
14:03	Q. Okay. So is it correct to say that at		
14:04	the time you were writing this letter back to Penn,		
14:05	you wanted to know the status of the book, both		
14:06	whether the manuscript was complete and whether it		
14:07	was accepted for publication?		
14:08	A. Yes.		
15:14 - 18:02	Constant, Caroline 2022-10-13	00:02:36	CC_FINAL.4
15:14	THE WITNESS: As I indicated in		

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DESIGNATION	SOURCE	DURATION	ID
15:15	the letter, specifically in the letter, the		
15:16	status of the book project was a primary		
15:17	concern of mine in terms of submitting an		
15:18	evaluation. The status of the manuscript,		
15:19	the status of whether it had been accepted		
15:20	for publication.		
15:21	BY MS. UEHLER:		
15:22	Q. All right. Thank you for confirming.		
15:23	Let's stay on that second page		
15:24	of Exhibit 27, your February 9th letter, but go		
16:01	towards the bottom. There's a paragraph that		
16:02	begins, "In conclusion."		
16:03	Can you read that section until		
16:04	about halfway down the paragraph?		
16:05	A. "In conclusion, the range and potential		
16:06	depth of Veikos's scholarship are commendable for a		
16:07	faculty member who is trained and practicing as an		
16:08	architect, rather than in scholarship. Such tenure		
16:09	cases are not easy to evaluate. Although many		
16:10	design faculty/practitioners also publish essays, it		
16:11	is relatively unusual for a design faculty member		
16:12	engaging in practice to also produce a book		
16:13	manuscript - and one that promises to advance		
16:14	scholarship in a significant area, as does Veikos's		
16:15	forthcoming work on Lina Bo Bardi. The status of		
16:16	that book project remains a primary question,		
16:17	however."		
16:18	Q. Thank you. And can you then skip over		
16:19	to, really, it's that last sentence of your letter		
16:20	on the third page? Could you read that as well?		
16:21	A. "It is clear that Veikos has embarked on a		
16:22	significant and promising body of research on		
16:23	Lina Bo Bardi, and I eagerly look forward to her		
16:24	forthcoming book."		
17:01	I guess I -- sorry, you asked		
17:02	for the last sentence.		
17:03	Q. That's okay. Go ahead.		
17:04	A. "Because the status of that book project		
17:05	remains unclear at this time, however, I can only		
17:06	cautiously support her case for tenure."		
17:07	Q. Okay. Was there any reason for your		

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DESIGNATION	SOURCE	DURATION	ID
	17:08 cautious support, other than the lack of information		
	17:09 about the status of the Bo Bardi book?		
	17:10 A. That was the -- that was the reason, really.		
	17:11 Q. Did anyone from Penn ever contact you		
	17:12 to tell you that Professor Veikos's book had, in		
	17:13 fact, been accepted for publication?		
	17:14 A. No.		
	17:15 Q. Did you ever receive the manuscript		
	17:16 for the Bo Bardi book?		
	17:17 A. I did.		
	17:18 Q. Okay. Let me take -- I'm going to		
	17:19 have you look at another exhibit, which was		
	17:20 pre-marked as P-28. It's a letter dated March 26,		
	17:21 2011.		
	17:22 A. Yes.		
	17:23 Q. Is this a follow-up letter that you		
	17:24 wrote to Professor Braham about Professor Veikos?		
	18:01 A. Yes. So this was -- this was written after		
	18:02 I received the manuscript.		
18:06 - 19:22	Constant, Caroline 2022-10-13	00:01:58	CC_FINAL.5
	18:06 BY MS. UEHLER:		
	18:07 Q. All right. Did you have a chance to		
	18:08 review the book manuscript prior to submitting this		
	18:09 letter dated March 26th?		
	18:10 A. Well, because we were only given a very		
	18:11 short -- I was only -- sorry, I was only given a		
	18:12 very short time to review the manuscript, I think I		
	18:13 had maybe two or three days to do so. So all I		
	18:14 could read was Professor Veikos's introduction and		
	18:15 not her translation of the essay by Lina Bo Bardi.		
	18:16 Q. Okay.		
	18:17 A. So that -- which would have enabled me to		
	18:18 more fully assess her contribution.		
	18:19 Q. Okay. All right. Why don't we, for		
	18:20 this letter, for P-28, if you can look to the		
	18:21 third page, I want to look at your conclusion		
	18:22 paragraph again, because it's slightly changed from		
	18:23 the prior one. Could you read that out loud, the		
	18:24 "In conclusion" paragraph of this exhibit?		
	19:01 A. Yes. "In conclusion, the range and		

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DESIGNATION	SOURCE	DURATION	ID
	19:02 potential depth of Veikos's scholarship are		
	19:03 commendable for a faculty member who's trained and		
	19:04 practicing as an architect, rather than as a		
	19:05 scholar. Such tenure cases are not easy to		
	19:06 evaluate. Although many design faculty		
	19:07 practitioners also publish essays, it is relatively		
	19:08 unusual for a design faculty member to engage in		
	19:09 practice -- engaging in practice to also produce a		
	19:10 book manuscript - and one that promises to advance		
	19:11 scholarship in this significant area, as does		
	19:12 Veikos's forthcoming work on Lina Bo Bardi. The		
	19:13 status of the book project remains a primary		
	19:14 question, however. Acceptance for publication by		
	19:15 Routledge, if only provisional, would be a		
	19:16 significant factor on which to base a positive		
	19:17 evaluation of her case."		
	19:18 Q. Okay. So is it correct to say that		
	19:19 your opinion about her scholarship in this letter		
	19:20 was more positive, but that it was still qualified		
	19:21 because of the lack of information about the book		
	19:22 status?		
19:24 - 19:24	Constant, Caroline 2022-10-13	00:00:01	CC_FINAL.6
	19:24 A. Exactly.		
20:01 - 20:23	Constant, Caroline 2022-10-13	00:00:59	CC_FINAL.7
	20:01 Q. Did you find out, as part of this		
	20:02 lawsuit, that Professor Veikos's book had, in fact,		
	20:03 been accepted for publication --		
	20:04 A. Yes.		
	20:05 Q. -- by the board?		
	20:06 A. Yes. As part of the lawsuit only.		
	20:07 Q. Right. Okay. Would knowing that		
	20:08 information at the time have influenced your		
	20:09 assessment as an external reviewer?		
	20:10 A. Definitely. I would have much more		
	20:11 enthusiastically recommended her case for tenure.		
	20:12 Q. Would you have been in a position at		
	20:13 that point to be able to opine as to whether she		
	20:14 would achieve tenure at a peer institution?		
	20:15 A. In my opinion, she would achieve tenure at a		
	20:16 peer institution on that basis.		

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DESIGNATION	SOURCE	DURATION	ID
	20:17 Q. Let's take a look at exhibit -- what's		
	20:18 been marked as P-29, please. It's a one-page e-mail		
	20:19 dated May 6th.		
	20:20 A. Yes.		
	20:21 Q. Did you receive this e-mail from		
	20:22 Professor Braham on May 6th?		
	20:23 A. I did.		
21:11 - 22:12	Constant, Caroline 2022-10-13	00:01:09	CC_FINAL.8
	21:11 Q. What did you understand		
	21:12 Professor Braham to be asking you in this e-mail		
	21:13 from May 6 of 2011?		
	21:14 A. He was asking me whether knowledge of the		
	21:15 fact that her tenure case had been extended a year		
	21:16 would have influenced my assessment.		
	21:17 Q. Okay. And what was your response?		
	21:18 A. I said it would not.		
	21:19 Q. Okay. And if I'm looking at the --		
	21:20 focusing on the time here, it looks like you were		
	21:21 able to respond in just a couple of minutes from the		
	21:22 request; is that right?		
	21:23 A. That's right.		
	21:24 Q. At this point, so as of early May of		
	22:01 2011, did Professor Braham or anyone else at Penn		
	22:02 respond to your inquiry in your prior letters about		
	22:03 whether Professor Veikos's book had been accepted		
	22:04 for publication?		
	22:05 A. No.		
	22:06 Q. All right. Let's take a look at the		
	22:07 next exhibit, which was pre-marked as Exhibit P-30.		
	22:08 This is another e-mail exchange, this one dated		
	22:09 May 16th.		
	22:10 Did you have this e-mail		
	22:11 exchange with Professor Braham that day?		
	22:12 A. I did.		
22:16 - 23:09	Constant, Caroline 2022-10-13	00:00:44	CC_FINAL.9
	22:16 BY MS. UEHLER:		
	22:17 Q. Can you tell us why you sent this		
	22:18 follow-up e-mail?		
	22:19 A. Because I noticed that the letter --		
	22:20 sorry -- the e-mail asking me whether I was --		

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DESIGNATION	SOURCE	DURATION	ID
	22:21 whether the decision to give Professor Veikos an		
	22:22 extra year -- or, sorry, that's not correct. To		
	22:23 extend her review another year would have influenced		
	22:24 my decision. They -- that was accompanied by the		
	23:01 wrong letter from me. It was accompanied by the		
	23:02 earlier letter from me, rather than the subsequent		
	23:03 one.		
	23:04 Q. I see.		
	23:05 A. Well, I was concerned that the earlier		
	23:06 letter was going through as written, rather than as		
	23:07 amended.		
	23:08 Q. I see. Okay. Thank you for		
	23:09 explaining that.		
26:14 - 26:15	Constant, Caroline 2022-10-13	00:00:03	CC_FINAL.10
	26:14 MS. UEHLER: Thank you. I have		
	26:15 no further questions.		
28:02 - 28:20	Constant, Caroline 2022-10-13	00:01:20	CC_FINAL.11
	28:02 You said, "Although her text constitutes an		
	28:03 extremely promising beginning to her engagement of		
	28:04 these questions, it comes closer to addressing the		
	28:05 'what' than the 'what is not' or even 'why.' In		
	28:06 other words, at this stage of her inquiry, Veikos		
	28:07 seems to be tracing the sources -- the what -- but		
	28:08 without sufficiently theorizing the why."		
	28:09 What did you mean by that?		
	28:10 A. I meant that, in her book manuscript, she --		
	28:11 if I recall correctly. I haven't reread it in all		
	28:12 these years. But I recall that she -- that		
	28:13 Bo Bardi -- she traced extensive sources for		
	28:14 Bo Bardi's ideas and interrelationship of Bo Bardi's		
	28:15 ideas with contemporary theorizing, but did not go		
	28:16 on to kind of analyze the specifics of those -- that		
	28:17 idea.		
	28:18 Q. Is analysis sometimes referred to as		
	28:19 either theorizing or thought leadership?		
	28:20 A. I suppose it could be.		
29:04 - 29:10	Constant, Caroline 2022-10-13	00:00:23	CC_FINAL.12
	29:04 Q. Did you say -- did you use the word		
	29:05 "thought leadership" in your March 26th, 2011 letter		
	29:06 to Professor Braham, the second letter you wrote on		

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DESIGNATION	SOURCE	DURATION	ID
	29:07 Professor Veikos's tenure candidacy?		
	29:08 A. I don't believe I did.		
	29:09 Q. Did you use the word "analysis"?		
	29:10 A. I don't recall.		
30:03 - 30:07	Constant, Caroline 2022-10-13	00:00:18	CC_FINAL.13
	30:03 Q. But that's what you wrote. You wrote		
	30:04 that it addresses the "what" but not the "why," and		
	30:05 that at this stage of the inquiry, Professor Veikos		
	30:06 had not sufficiently theorized the "why," correct?		
	30:07 A. Correct.		
30:19 - 31:09	Constant, Caroline 2022-10-13	00:00:43	CC_FINAL.14
	30:19 Q. Did you ever reach out to Bill Braham		
	30:20 to ask him about his handling of Professor Veikos's		
	30:21 case?		
	30:22 A. I did not.		
	30:23 Q. Did you reach out to Genie Birch to		
	30:24 ask her why she wrote the letter that she wrote or		
	31:01 why she voted against tenure?		
	31:02 A. I didn't know about her letter until many,		
	31:03 many years later. So, no, I did not.		
	31:04 Q. At any time before today, have you		
	31:05 talked to anyone at Penn who was involved in the		
	31:06 consideration of Professor Veikos for tenure to ask		
	31:07 them why they reached the conclusions they did or		
	31:08 about the tenure process as it unfolded?		
	31:09 A. I did not.		
32:15 - 33:06	Constant, Caroline 2022-10-13	00:00:34	CC_FINAL.15
	32:15 Q. Sure. In your tenure-review letters		
	32:16 that you wrote for Professor Veikos, you noted that		
	32:17 you hadn't spoken to her in many years before 2011,		
	32:18 and you felt that that was a factor in your ability		
	32:19 to be objective, that you weren't basing it on		
	32:20 discussions with her or your knowledge of her		
	32:21 personally. Instead, you were --		
	32:22 A. Yes.		
	32:23 Q. -- pointing to or analyzing her		
	32:24 scholarship.		
	33:01 A. Right.		
	33:02 Q. Is that right?		
	33:03 A. Yes.		

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DESIGNATION	SOURCE	DURATION	ID
	33:04 Q. Is it important for an external		
	33:05 reviewer to be objective?		
	33:06 A. Yes.		
33:20 - 33:22	Constant, Caroline 2022-10-13	00:00:04	CC_FINAL.16
	33:20 Q. Have you talked to her lawyer, Julie		
	33:21 Uebler?		
	33:22 A. Yes.		
34:02 - 34:02	Constant, Caroline 2022-10-13	00:00:01	CC_FINAL.17
	34:02 Q. How many times?		
34:05 - 34:06	Constant, Caroline 2022-10-13	00:00:07	CC_FINAL.18
	34:05 A. I don't know. She asked me if I would		
	34:06 participate in this process.		
40:02 - 40:04	Constant, Caroline 2022-10-13	00:00:06	CC_FINAL.19
	40:02 Q. Okay. Did you ask Professor Braham		
	40:03 why he hadn't sent it to you sooner?		
	40:04 A. I didn't.		
48:07 - 49:01	Constant, Caroline 2022-10-13	00:01:04	CC_FINAL.20
	48:07 Q. Okay. Are you aware of any		
	48:08 communication to Bill Braham before March 24, 2011,		
	48:09 at 9:07 p.m. about Professor Veikos's manuscript		
	48:10 being accepted by the publisher?		
	48:11 A. I am not.		
	48:12 Q. Now, by that point, it was very		
	48:13 shortly before you prepared or finalized your		
	48:14 supplemental external review letter for		
	48:15 Professor Veikos, right?		
	48:16 A. Exactly.		
	48:17 Q. You sent that in on March 26th?		
	48:18 A. Yes.		
	48:19 Q. When did you start working on it?		
	48:20 A. I honestly can't recall. I believe I had to		
	48:21 do it really quickly because I was very busy that		
	48:22 week with my teaching responsibilities, and I think		
	48:23 I only had a couple of days to work on it.		
	48:24 Q. Okay. So --		
	49:01 A. But really, I can't be precise here.		
50:21 - 50:24	Constant, Caroline 2022-10-13	00:00:13	CC_FINAL.21
	50:21 Q. Was March 22nd of 2011 the last time		
	50:22 that Professor Braham communicated with you before		

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DESIGNATION	SOURCE	DURATION	ID
	50:23 you wrote your March 26th letter?		
	50:24 A. I believe it was, yes.		
56:20 - 57:08	Constant, Caroline 2022-10-13	00:00:37	CC_FINAL.22
	56:20 Q. In your experience, do external		
	56:21 reviewers sometimes have sharply differing opinions		
	56:22 about a candidate's scholarship or qualifications?		
	56:23 A. I would say not sharply differing, no.		
	56:24 Q. Okay. But different sometimes. Some		
	57:01 people will think a candidate has the requisite		
	57:02 scholarship to be granted tenure, and other		
	57:03 reviewers may see it differently. Have you seen		
	57:04 that before?		
	57:05 A. I have, but usually I think there is a		
	57:06 strong consensus.		
	57:07 Q. Is consensus important?		
	57:08 A. I think so.		
64:03 - 64:24	Constant, Caroline 2022-10-13	00:00:57	CC_FINAL.23
	64:03 Q. Okay. Now, let's -- I also want to		
	64:04 draw your attention to two exhibits you looked at		
	64:05 earlier, P-29 and P-30. Those e-mails -- I'll wait.		
	64:06 Let's make sure you have it.		
	64:07 A. Sorry, they're out of order now on my --		
	64:08 Q. Take your time.		
	64:09 A. Okay.		
	64:10 Q. Take your time.		
	64:11 A. Got them.		
	64:12 Q. Okay. So those e-mails were e-mails		
	64:13 you exchanged with Professor Braham, correct?		
	64:14 A. Yes.		
	64:15 Q. And they were in May of 2011, correct?		
	64:16 A. Yes.		
	64:17 Q. And so that was months after the date		
	64:18 on the publication contract that Mr. Banks presented		
	64:19 to you a few minutes ago, correct?		
	64:20 A. Correct.		
	64:21 Q. And even at that time, in May of 2011,		
	64:22 Professor Braham never communicated to you that		
	64:23 Professor Veikos's book had been accepted for		
	64:24 publication, did he?		
65:02 - 65:07	Constant, Caroline 2022-10-13	00:00:14	CC_FINAL.24

CC_FINAL - Caroline Constant Final Designations

DESIGNATION	SOURCE	DURATION	ID
65:02	A. He did not.		CC_FINAL.24
65:03	Q. Did Professor Braham at any point,		
65:04	including as of May, 2011, tell you that		
65:05	Professor Veikos's book had been accepted for		
65:06	publication?		
65:07	A. He did not.		

Plaintiff Direct	00:21:09
TOTAL RUN TIME	00:21:09